

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2021-93-E

In the Matter of:)

Dominion Energy South Carolina,)
 Incorporated's Request for "Like)
 Facility" Determinations Pursuant to)
 S.C. Code Ann. § 58-33-110(1) and)
 Waiver of Certain Requirements of)
 Commission Order No. 2007-626)
 (This Filing Does Not Involve any)
 Change to the Retail Electric or)
 Natural Gas Base Rates))

**JOINT MOTION TO HOLD
 PROCEEDING IN ABEYANCE**

The South Carolina Coast Conservation League, the Southern Alliance for Clean Energy, the Sierra Club, and the Carolinas Clean Energy Business Association (collectively, "Movants") respectfully request that the Commission issue an order to hold this proceeding in abeyance until 60 days¹ after filing of the DESC 2021 IRP Update. The Movants respectfully request that the Commission adopt the schedule set out below on that basis. Notwithstanding the proposed schedule, the Movants reserve the right to request a further extension based on the status of the 2021 IRP Update proceeding.

Event:	Date: <i>(Based on an August 17th Filing Date for DESC's 2021 IRP Update)</i>
Applicant/Complainant/Petitioner Testimony Due	October 18, 2021

¹ Because 60 days following the August 17 is a Saturday, the proposed due date for the Applicant's testimony is actually 62 days after the filing of the DESC 2021 IRP Update.

All Other Parties Due Date	November 10, 2021
Rebuttal Testimony Due	November 17, 2021
Surrebuttal Testimony Due Date	November 24, 2021
Hearing	TBD but not sooner than December 1, 2021

In the above-referenced docket, Dominion Energy South Carolina (“DESC” or the “Company”) proposes to replace peaking generation with natural gas combustion turbines (“CT Plan”). On July 1, 2021, the Commission issued a scheduling order in this docket establishing a procedural schedule in which the Company’s direct testimony will be due August 5, 2021, with intervenor direct testimony due August 19, 2021.² However, in Docket No. 2019-226-E, the Commission ordered that the Company include revised modeling and substantive details about the CT Plan in its 2021 IRP Update, due on August 17, 2021.³ Thus, DESC will not file its 2021 IRP Update until after its own direct testimony deadline in this proceeding, and only two days before the deadline for intervenor direct testimony. As such, under the Commission’s July 1, 2021 procedural order, the information and additional context provided in the Company’s 2021 IRP Update will be unavailable for consideration in this CT Plan proceeding.

Accordingly, Movants’ request for abeyance until 60 days after DESC’s filing of its 2021 IRP update thereby ensuring that the Commission, parties to this docket, and the South Carolina public have the information from the 2021 IRP update to inform any Commission determination on the CT Plan.

² Prefile Testimony Ltr., Docket No. 2021-93-E (July 1, 2021).

³Order No. 2021-429, Docket. No. 2019-226-E, at 1 (June 18, 2021).

Movants have consulted with attorneys for DESC and are authorized to report that DESC consents to holding this proceeding in abeyance until 60 days after DESC's filing of its 2021 IRP Update. DESC understands that Movants reserve their right to request a further extension, and DESC will evaluate its position on such further request at the time it is made.

WHEREFORE, Movants respectfully request that the Commission issue an order to hold this proceeding in abeyance until 60 days after DESC's filing of its 2021 IRP Update, while reserving the right to request a further extension based on the status of the 2021 IRP Update proceeding. Due to the approaching deadlines for this proceeding, Movants further request that the Commission act on this motion on an expedited basis as permitted by S.C. Code Ann. Regs. 103-829(A).⁴

Respectfully submitted this 15th day of July, 2021.

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⁴ To act on an expedited basis, the Commission or its designee may condense the period of time normally permitted to respond and reply to a motion where there is "good cause." S.C. Code Ann. Regs. 103-829(A). In recent years, the hearing officer has found good cause to modify the time permitted to file a response and reply when the question presented in the motion is an "important one" and the hearing date is not far away, as is the case here. Order No. 2018-135-H, Docket Nos. 2017-370-E, 2017-207-E, and 2017-305-E (Oct. 2, 2018); *see also* Order No. 2021-28-H, Docket No. 2020-229-E (Mar. 12, 2021).

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CERTIFICATE OF SERVICE

I certify that the following persons have been served with one (1) copy of the *Joint Motion to Hold Proceeding in Abeyance* by electronic mail or U.S. First Class Mail at the addresses set forth below:

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This the 15th day of July, 2021.
/s/ Kate Mixson